

**UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF MASSACHUSETTS**

RÜMEYSA ÖZTÜRK,

Petitioner,

v.

DONALD J. TRUMP, et al.,

Respondents.

Civil Action No. 1:25-cv-10695-DJC

**ASSENTED TO MOTION FOR REMOTE PARTICIPATION BY SOME OF
PETITIONER’S COUNSEL AT ARGUMENT**

1. Petitioner, by and through counsel, respectfully request leave for some of her counsel to remotely participate in today’s 2 p.m. hearing by telephonic or other remote means.

2. As grounds Petitioner states that certain of her counsel are located outside of Massachusetts. In particular, attorney Brian Hauss is currently located in New York and attorney Noor Zafar is currently located in New York.

3. Given the complexity and scope of the issues, Petitioner’s counsel intend to divide the argument on the petition today between several attorneys. Petitioner’s counsel in Massachusetts will appear and participate in person. However, if possible, Petitioner’s counsel would like for attorneys Hauss and Zafar to argue certain aspects of the petition, as well.

4. This hearing was noticed yesterday. D.E. 21. Attorney Hauss is currently located in New York while attorney Zafar is currently located in Texas. Neither attorney Hauss nor attorney Zafar was able to travel to Boston in time for the hearing today.

5. Accordingly, Petitioner respectfully requests leave for attorneys Hauss and Zafar to remotely participate and argue certain issues at today’s hearing by telephonic or other remote means.

6. The government assents this motion.

Dated: April 3, 2025

Respectfully submitted,

By: /s/ Julian Bava

Jessie J. Rossman (BBO #670685)
Adriana Lafaille (BBO #680210)
Rachel E. Davidson (BBO #707084)
Julian Bava (BBO #712829)
AMERICAN CIVIL LIBERTIES UNION
FOUNDATION OF MASSACHUSETTS, INC.
One Center Plaza, Suite 850
Boston, MA 02108
(617) 482-3170
jrossman@aclum.org
alafaille@aclum.org
rdavidson@aclum.org
jbava@aclum.org

Mahsa Khanbabai (BBO #639803)
115 Main Street, Suite 1B
North Easton, MA 02356
(508) 297-2065
mahsa@mk-immigration.com

Brian Hauss
Esha Bhandari
Brett Max Kaufman*
Noor Zafar
Sidra Mahfooz*
AMERICAN CIVIL LIBERTIES UNION
FOUNDATION
125 Broad Street, Floor 18
New York, NY 10004
(212) 549-2500
bhauss@aclu.org
ebhandari@aclu.org
bkaufman@aclu.org
nzafar@aclu.org
smahfooz@aclu.org

Matthew D. Brinckerhoff
Katherine Rosenfeld
Vasudha Talla
Sonya Levitova

EMERY CELLI BRINCKERHOFF ABADY
WARD & MAAZEL LLP

One Rockefeller Plaza, 8th Floor
New York, NY 10020
212-763-5000
mbrinckerhoff@ecbawm.com
krosenfeld@ecbawm.com
vtalla@ecbawm.com
slevitova@ecbawm.com

Ramzi Kassem*
Naz Ahmad*
Mudassar Toppa*
Shezza Abboushi Dallal*
CLEAR PROJECT
MAIN STREET LEGAL SERVICES, INC.
CUNY School of Law
2 Court Square
Long Island City, NY 11101
(718) 340-4558
ramzi.kassem@law.cuny.edu
naz.ahmad@law.cuny.edu
mudassar.toppa@law.cuny.edu
shezza.dallal@law.cuny.edu

Counsel for Petitioner

**Pro hac vice application forthcoming*

LOCAL RULE 7.1 CERTIFICATION

I hereby certify that on April 3, 2025, counsel for Petitioner contacted counsel for the Respondents in a good faith effort to narrow or resolve the issues presented by this motion. Counsel for Respondents assents to this motion.

April 3, 2025

/s/ Julian Bava
Julian Bava

CERTIFICATE OF SERVICE

I hereby certify that on April 3, 2025, a true copy of the above document will be filed via the Court's CM/ECF system and that a copy will be sent automatically to all counsel of record.

April 3, 2025

/s/ Julian Bava
Julian Bava